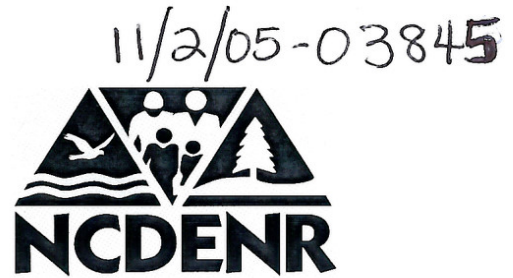


North Carolina  
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Dexter R. Matthews, Director



November 2, 2005

Commander Atlantic Division  
Naval Facilities Engineering Command  
6506 Hampton Blvd.  
Norfolk VA 23508-1278

Attention: Rodger W. Jackson, P.E.  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Blvd.  
NC/Caribbean IPT  
Building C, 3rd Floor  
Norfolk, Va. 23508-1278

RE: Comments on the Draft SWMUs 303/318 RCRA Facility Investigation Report  
MCB Camp Lejeune, NC  
Soil and Groundwater  
Camp Lejeune, NC6170022580  
Jacksonville, Onslow County, North Carolina

Dear Mr. Jackson:

The NC Superfund Section has received and reviewed the Draft Solid Waste Management Units (SWMUs) 303/318 RCRA Facility Investigation (RFI) Report for the Camp Lejeune, MCB located in Jacksonville, NC. The following comments are offered for the Work Teams consideration. If you have any questions or comments please contact me at (919) 508 8467 or email at [randy.mcelveen@ncmail.net](mailto:randy.mcelveen@ncmail.net).

#### **General Comment**

The SWMU 303/318 RFI Report appears to be in good order and represents the data well. Please notify the NC Superfund Section Representative as to the days that additional work will be done on base.

#### **Specific Comments**

1. The first paragraph at the top of page 2-8 is inconsistent with EPA SOPs and State guidance and practice for purging and sampling monitoring wells for RCRA Waste. Before varying from the EPA SOPs for groundwater sampling, proposed purge and sampling changes must be discussed with the partnering team to assure that proper  
1646 Mail Service Center, Raleigh, North Carolina 27699-1646  
Phone: 919-508-8400 \ FAX: 919-715-3605 \ Internet: [www.enr.state.nc.us](http://www.enr.state.nc.us)

techniques are being used consistent State and EPA guidance. At a minimum the State requires that one well volume be purged prior to sampling and purging and sampling should be done at a reasonable extraction rate not to include micro purge rates.

2. Potable well PSWAS4140 is labeled as PSWHP-4140 in the last sentence at the top of page 3-3. Please make appropriate changes.
3. Figure 3-9 shows the groundwater contour map of the Upper Castle Hayne Aquifer as of February 2005. Why is there such a significant difference in groundwater elevation data and groundwater flow direction between January 2005 (Figure 3-10) and February 2005 (Figure 3-9)? If Figure 3-9 under sparging conditions at Site 86 please discuss this in the appropriate sections of the report and make a note to that effect on Figure 3-9.
4. As stated in the last paragraph on page 8-2 the soil data and shallow groundwater data indicate that the TCE and degradation products in the intermediate and deep aquifer are not site related. Will there be an additional effort to locate the source of the TCE in this area or will the plume be treated along with the 303/318 plume?
5. The recommendations at the bottom of page 8-4 include removal of contaminated soil beneath the wash pad. Will this include removal of the surface contamination at SWMU 318-SS01 and SWMU318-IS02 as discussed in the first paragraph on page 8-4?
6. Dave Lilley with the NC Superfund Section is in the process of reviewing the Human Health and Ecological Risk Assessment sections of the Report. His comments will be forwarded when they are completed.

If you have any questions or comments, please contact me, at (919) 733-2801, extension 341 or email [randy.mcelveen@ncmail.net](mailto:randy.mcelveen@ncmail.net)

Sincerely,

Randy McElveen  
Environmental Engineer  
NC Superfund Section

Cc: Dave Lown, PE, PG, NC Superfund Section  
Ken Cobb, EMD/RCRA  
Bob Lowder, EMD/IR  
Louis Palmer, CH2MHill

11/2/05 - 0.3344

---

**Capito, Bonnie P CIV NAVFAC Lant**

**From:** Jackson, Rodger W CIV NAVFAC Lant  
**Sent:** Wednesday, January 25, 2006 8:57 AM  
**To:** Capito, Bonnie P CIV NAVFAC Lant  
**Subject:** FW: State Comments on the RCRA SWMU 303/318 RFI Report

**Attachments:** Nov 2, 2005 Comments SWMUs 303\_318 RFI Rpt.doc; Nov 2, 2005 Comments SWMUs 303\_318 RFI Rpt.rtf



Nov 2, 2005      Nov 2, 2005  
mments SWMUs 303\_318 RFI Rpt.doc      mments SWMUs 303\_318 RFI Rpt.rtf  
Camp Lejeune Site File

Rodger W. Jackson, P.E.  
NAVFAC Atlantic  
NC/Caribbean IPT, Code OPCEV  
6506 Hampton Blvd.  
Norfolk, Va. 23508-1278  
Tel: (757) 322-4589 Fax: (757) 322-4530  
Email: rodger.jackson@navy.mil

-----Original Message-----

From: Randy McElveen [mailto:Randy.McElveen@ncmail.net]  
Sent: Wednesday, November 02, 2005 17:07  
To: jculp; Robert SoK; Lowder CIV Robert A; Mat Louth; Jackson, Rodger W  
CIV NAVFAC Lant; Cobb CIV Kenneth W; Louise Palmer; David Lown  
Subject: State Comments on the RCRA SWMU 303/318 RFI Report

Hi Ken,  
Attached are the States comments on the RFI Report for SWMU 303/318.  
Dave Lilley is reviewing the Human Health and Eco but do not delay work  
for this since there is no current risks.  
Randy McElveen, NC Superfund Section

--

"He is no fool who gives what he cannot keep to gain what he cannot lose."  
Jim Elliot, Shadow of the Almighty

W. Randy McElveen  
Environmental Engineer  
401 Oberlin Road, Ste. 150  
1646 Mail Service Center  
Raleigh, NC 27699-1646  
Phone: (919) 508 8467  
Email: Randy.McElveen@ncmail.net